

July 15, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Notice of *Ex Parte* Meeting
WC Docket Nos. 04-36, 05-196**

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's ("Commission") Rules, this letter serves to provide notice in the above-captioned proceedings of an *ex parte* meeting on July 14, 2005 between representatives of Vonage Holdings Corp. and its affiliates ("Vonage") and Chairman Kevin Martin, Daniel Gonzalez, Chief of Staff, and Michelle Carey, Legal Advisor, Wireline. In attendance on behalf of Vonage was Jeffrey Citron, Chairman and CEO, Christopher Murray, Vice President Federal Regulatory Affairs, Martin Hakim Din, Senior Vice President of Architecture as well as the undersigned and Alfred Mottur of Brownstein Hyatt Farber.

In this meeting, Vonage underscored its commitment to public safety and stressed that it will undertake every effort to ensure that VoIP consumers have access to 911 and E911 services as rapidly as possible. Vonage highlighted that it has already deployed these services to over 50,000 lines in New York City thanks to the cooperative efforts of industry, government and the public safety community.

In addition to describing its ongoing efforts to deploy emergency services in accordance with the 120-day requirements, Vonage provided information regarding the significant effort that it is undertaking to satisfy customer notification and acknowledgement requirements. First, Vonage has changed its subscription process to capture affirmative acknowledgement prior to service initiation. Second, Vonage is utilizing a wide variety of means to notify and obtain affirmative acknowledgement from existing subscribers. This includes the development of various online acknowledgement mechanisms, electronic mail, telephone calls, voicemail prompts and postal mail. Vonage has also retained a third party provider to assist in its efforts.

In response to questions from Vonage regarding the Commission's expectation on how covered VoIP providers should address instances in which a provider did not obtain a record of affirmative acknowledgement by the Effective Date, the Chairman stated that these providers should be prepared to suspend service to these accounts.

Although Vonage projects that by the Effective Date a vast majority of customers will have provided the Company their affirmative acknowledgement, Vonage expressed concerns that some number of customers will be unable to provide an acknowledgement by such date. For example, some customers may be active duty military personnel or others may be on vacation. Vonage noted that under current plans, it will have, by the Effective Date, sent as many as 5 electronic mail messages, repeated telephone calls and automated voicemail notifications as well as have distributed written correspondence and stickers by postal mail.

In light of the repeated and constant nature of the customer notification initiative it has undertaken, the Company expressed concerns about the impact of service suspension. Vonage expressed concerns that such a suspension could effectively deprive customers of any means of communication which, in an actual emergency, could impair a customers ability to reach either an emergency call taker or another person who might provide assistance. Vonage also noted that it may take 15 days or longer to develop a reliable mechanism that would enable the Company to discontinue and/or rapidly restore service to service to affected customers.

Pursuant to the Commission's Rules, this letter is being filed in the above-captioned proceedings for inclusion in the public record. Should you have any questions, please do not hesitate to contact me.

William B. Wilhelm, Jr.

/s/

Counsel for Vonage Holdings Corp.

cc: Chairman Kevin J. Martin
Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Daniel Gonzalez
Michelle Carey
Russell Hanser
Jessica Rosenworcel
Scott Bergmann
Thomas Navin
Julie Veach
Christi Shewman
Alfred E. Mottur